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April 15, 2019

## VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Bridging the Digital Divide for Low Income-Consumers, WC Docket No. 17-287;  
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;  
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No.  
09-197

### Notice of In Person Ex Parte Communication

Dear Ms. Dortch:

On April 11, 2019, representatives from TracFone Wireless, Inc., met in person with a Commission staff member, namely:

- Travis Litman - Chief of Staff and Senior Legal Advisor, Wireline and Public Safety

On behalf of TracFone, the following representatives attended the meeting:

- Mark Rubin - Senior Executive for Government Affairs
- Geoff Why - Verrill Dana, LLP, counsel for TracFone

Mr. Litman and TracFone discussed the 2016 Lifeline Order<sup>1</sup> and the recent launches of the National Verifier. Mr. Litman and TracFone further discussed the Universal Service

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<sup>1</sup> See *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, para. 133 (2016) (“USAC shall consider how the National Verifier can address possible misuse of eligibility documentation (e.g. SNAP cards lacking identifying information.”).

Administrative Co.'s ("USAC's") automated access to state databases of low-income programs, such as the Supplemental Nutrition Assistance Program ("SNAP") and Medicaid, which USAC uses to confirm applicants' Lifeline eligibility. TracFone reiterated its concern that, in many states, the National Verifier lacks access to SNAP and Medicaid databases, which can result in significant Lifeline re-verification failure rates. In states that do not have access to a SNAP database and where Lifeline recipients are using manual verification, TracFone proposed that applicants could demonstrate Lifeline eligibility using a SNAP card along with additional eligibility documentation. Because in the vast majority of states SNAP cards bear the cardholder's name and account number, TracFone proposed that SNAP cards along with a recent receipt from a SNAP purchase could together constitute qualifying eligibility documentation.

TracFone reiterated its support for Sprint's March 18, 2019 request that the Commission not hard launch the National Verifier in states that do not have automated access to SNAP and Medicaid databases.<sup>2</sup>

Lastly, Mr. Litman and TracFone discussed Minimum Service Standards for ETCs as proposed in the 2016 Lifeline Order.<sup>3</sup> TracFone explained that it has significant concerns regarding the December 2019 Minimum Service Standards.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is filed in ECFS. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Geoffrey G. Why  
Geoffrey G. Why

CC:

- Travis Litman - Chief of Staff and Senior Legal Advisor, Wireline and Public Safety

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<sup>2</sup> See Letter of Sprint to Marlene Dortch dated March 18, 2019 at 1-4, WC Docket Nos. 17-287, 11-42 and 09-197, at 3 (explaining that the "mass de-enrollment of potentially millions of otherwise-eligible Lifeline subscribers because of a difficult and ineffective reverification process clearly is not in the public interest").

<sup>3</sup> See *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd. 3962, para. 69 (2016).